

ID: CCA-413159-10

Number: **201043031**

Office:

Release Date: 10/29/2010

UILC: 860.00-00

---

**From:**

**Sent:** Tuesday April 13, 2010 3:09 PM

**To:**

**Cc:**

**Subject:** REIT Question – Deficiency Dividends and Cash/Stock Dividends

I reread Rev. Proc. 2010-15 and spoke to \_\_\_\_\_ and the cash/stock dividend rules would apply to a deficiency dividend for a year preceding the effective date of the revenue procedure and its predecessors.